

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

LEAH MIRABELLA, on behalf of herself and  
all others similarly situated,  
*Plaintiff,*

v.

RUE LA LA, INC. and KYNETIC LLC,  
*Defendants.*

C.A. No. 1:13-cv-11392-GAO

Class Action

**JOINT MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

Plaintiff Leah Mirabella (“Plaintiff”) and Defendants Rue La La, Inc. and Kynetic, LLC (collectively, “Defendants”) respectfully move the Court for final approval of the Settlement Agreement (“Agreement”) entered into between the Plaintiff and Defendants and for final certification of the class for settlement purposes. *See* Ex. A, Settlement Agreement. On November 13, 2014, this Court preliminarily granted approval of the Agreement and certified the class for settlement purposes. [Doc. 29].

In support of this request, the parties assert, *inter alia*, that the Agreement proposed for final approval is fair, reasonable, and adequate, and Plaintiff asserts that the proposed Settlement Class meets the requirements for certification under Fed. R. Civ. P. 23.

In further support of this Motion, the parties refer the Court to Plaintiff’s Memorandum in Support of Joint Motion for Final Approval of Class Action Settlement, the accompanying declarations, submitted herewith, to Defendants’ Memorandum in Support of Joint Motion for

Final Approval, and all documents filed of record in this matter. A proposed agreed Final Judgment and Order of Dismissal is attached hereto.

WHEREFORE, the parties respectfully request this Court grant this Joint Motion for Final Approval of Class Action Settlement, finalize certification of the class for settlement purposes and enter the proposed Final Judgment and Order of Dismissal to fully resolve the issues in Plaintiff's Class Action Complaint.

Dated: February 27, 2015

Respectfully Submitted,

/s/ Matthew E. Miller

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to each of attorney of record in this case.

/s/ Matthew E. Miller

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